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8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10  
11 In the Matter of the Accusation Against:

Case No. **2010-457**

12 **MARK RICHARD BROWN**

13 7115 N. Cecelia Avenue  
Fresno, California 93722

**ACCUSATION**

14 Registered Nurse License No. 583438

15 Respondent.

16  
17 1. Louise R. Bailey, M.Ed., RN (Complainant) alleges:

18 **PARTIES**

19 2. Complainant brings this Accusation solely in her official capacity as the Interim  
20 Executive Officer of the Board of Registered Nursing, Department of Consumer Affairs.

21 3. On or about July 13, 2001, the Board of Registered Nursing issued Registered Nurse  
22 License Number 583438 to Mark Richard Brown (Respondent). The Registered Nurse License  
23 was in full force and effect at all times relevant to the charges brought herein and will expire on  
24 September 30, 2010, unless renewed.

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1 registered nurse. Respondent, as the acting Charge Nurse, failed to report the incident to his  
2 Supervisor.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Unprofessional Conduct)**

5 10. Respondent is subject to discipline under Code section 2761(a), on the grounds of  
6 unprofessional conduct, in that on or about January 30, 2008, while a licensed registered nurse  
7 and as an acting Charge Nurse at Saint Agnes Medical Center, located in Fresno, California,  
8 Respondent demonstrated unprofessional conduct, in the following respects:

- 9 a. Respondent allowed Colombini to be treated outside the Emergency Department's  
10 accounting system by failing to have him register as a patient.  
11 b. Respondent failed to report the incident to his Supervisor.

12 **PRAYER**

13 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged,  
14 and that following the hearing, the Board of Registered Nursing issue a decision:

- 15 1. Revoking or suspending Registered Nurse License Number 583438, issued to Mark  
16 Richard Brown;  
17 2. Ordering Mark Richard Brown to pay the Board of Registered Nursing the  
18 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
19 Professions Code section 125.3; and,  
20 3. Taking such other and further action as deemed necessary and proper.

21 DATED: \_\_\_\_\_

3/18/10

*Louise R. Bailey*

22 LOUISE R. BAILEY, M.ED., RN  
23 Interim Executive Officer  
24 Board of Registered Nursing  
25 Department of Consumer Affairs  
26 State of California  
27 Complainant

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